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January 5, 2012

By ECF & Facsimile

The Honorable I. Leo Glasser
United States District Judge
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

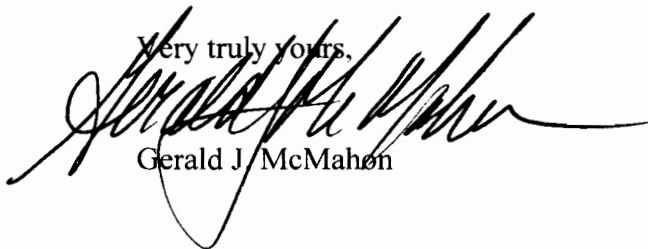
Re: United States v. Anthony Romanello
10 Cr. 929 (ILG)

Dear Judge Glasser:

In the last 24 hours, the government has produced 3500 material measuring one foot and two inches high, and last night they emailed the undersigned two motions *in limine* seeking to limit cross-examination of cooperating witnesses Andrew Zorsh and Generoso Barbieri. No explanation was given as to why these motions *in limine* could not have been filed weeks, if not months, ago.

This letter is to request that the Court summarily deny the government motions as untimely. As the government points out in its letters, the Court has the discretion to keep cross-examination within reasonable limits. Having waited until the eleventh hour, the government should be left to rely on trial objections and Court rulings. If Your Honor does wish me to address the merits of the government's motions, I seek leave to respond on Monday morning.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Gerald J. McMahon', is written over a horizontal line. The signature is fluid and cursive.

Gerald J. McMahon

GJM:cw

cc: All Counsel (by ECF)